## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Albert Russo

CN 4853

Trenton, NJ 08650

(609) 587-6888

Standing Chapter 13 Trustee

In re:

Michael Seidl

Case No. 20-20152 / MBK

Hearing Date: November 17, 2020 10:00 am

Judge: Michael B. Kaplan

Chapter: 13

Debtor(s)

## TRUSTEE'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN

Albert Russo, Standing Chapter 13 Trustee, objects to the Debtor(s) Plan for the following reason(s):

The debtor has failed to supply the Trustee with the following document(s):

**Domestic Support Obligation information** 

The debtor(s) is not paying all disposable income into the plan pursuant to either Schedules I & J or Form 22C based upon the Trustee's review of the income and tax returns provided. The Trustee's calculations are higher for the following reason(s): Verified income leaves monthly disposable income of \$991.00.

The debtor has failed to provide proof of service with respect to Plan Motion(s). Need proof of service on Township of Hamilton for motion to reclassify lien.

Need to file Pre-Confirmation Certification.

WHEREFORE, Standing Chapter 13 Trustee, Albert Russo, objects to confirmation of the plan.

/s/ Albert Russo

Albert Russo

Standing Chapter 13 Trustee

by: David Martin, Staff Attorney